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January 10, 2023

VIA ECF

Honorable Vincent L. Briccetti
United States District Court
Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: Jeanine Cohen v. Westlake Services, et al.
Civil Action No. 22-CV-07182 (VB)

Dear Judge Briccetti:

I represent Plaintiff Ms. Jeanine Cohen in the above-referenced action in which she claims that defendants subjected her to gender discrimination under Title VII, the Equal Pay Act, and the NYS Human Rights Law (the “NYSHRL”).

On January 6, 2023, defendants’ filed a motion to compel arbitration. Plaintiff’s date to serve/ file her opposition papers is January 20, 2023. Pursuant to Sec. 1.(G) of Your Honor’s Rules of Practice, on behalf of Plaintiff, and with no objection by defense counsel, the undersigned asks that the January 20th deadline be extended by two (2) weeks until Friday, February 3, 2023.

As I indicated to defendants’ counsel, on January 18th, in another case, Grimm v. Garnet Health, et al. before the Hon. Philip Halpern, I have to serve plaintiff’s counterstatement of facts to defendants to defendants’ Local 56.1 Statement. In the Grimm case, defendants’ Rule 56.1 Statement contains 205 statements of alleged undisputed facts and is thirty-five (35) pages long. Also I have to take two (2) full day depositions later this week in another matter.

This is the undersigned’s first request for an adjournment of the deadline for Plaintiff to file her opposition papers, and as set forth above, defense counsel has no objection to Plaintiff’s making this request for an extension.

Based on the foregoing reasons, on behalf of Plaintiff, the undersigned asks that Your Honor grant an extension until February 3, 2023 to serve/file her opposition papers to defendants’ motion to compel arbitration.

Thank you for Your Honor's consideration of this matter.

Respectfully Submitted,

By: /S/ Jimmy M. Santos
Jimmy M. Santos, Esq. (JS-0947)

cc: Craig Dickinson, Esq. (via ECF)